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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

**PURDUE PHARMA L.P., et al.,
Debtors.¹**

Chapter 11

**Case No. 19-23649 (RDD)
(Jointly Administered)**

SECOND DECLARATION OF JASMINE BALL

I, Jasmine Ball, an attorney duly admitted to practice in the Southern District of New York, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746:

1. I represent the Mortimer Sackler Initial Covered Sackler Persons (the “Mortimer Sackler ICSPs”) in this dispute.
2. I submit this declaration pursuant to the Stipulation and Agreed Order Regarding Media Intervenors’ Motion to Unseal Materials Filed in Connection with UCC Privileges

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

Motions (Dkt. No. 2140) in the above captioned case and state that true and correct copies or excerpts of the following documents are attached as exhibits hereto:

3. Attached as Exhibit 1 is a true and correct copy of excerpts from the November 24, 2020 deposition of Jonathan White. This document was previously filed under seal as exhibit 1 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

4. Attached as Exhibit 2 is a partially redacted true and correct copy of notes from a budget presentation made to the Purdue Board of Directors dated October 29 and 30, 2013, beginning with Bates number PPLPC012000452390. This document was previously filed under seal as exhibit 2 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

5. Attached as Exhibit 3 is a partially redacted true and correct copy of an email chain between Purdue executives dated November 1, 2013, beginning with Bates number PPLPC012000449535. This document was previously filed under seal as exhibit 3 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

6. Attached as Exhibit 4 is a partially redacted true and correct copy of an email chain between Mortimer D.A. Sackler and Richard Sackler, dated February 13, 2008, beginning with Bates number PPLPUCC9004448359. This document was previously filed under seal as exhibit 4 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

7. Attached as Exhibit 5 is a partially redacted true and correct copy of a financial statement prepared for Purdue by Ernst & Young in 2013, beginning with Bates number PPLPC030000761742. This document was previously filed under seal as exhibit 5 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

8. Attached as Exhibit 6 is a partially redacted true and correct copy of a financial statement prepared for Purdue by Ernst & Young in 2015, beginning with Bates number PPLPUCC9002450695. This document was previously filed under seal as exhibit 6 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

9. Attached as Exhibit 7 is a true and correct copy of excerpts from the October 30, 2020 deposition of Cecil Pickett. This document was previously filed under seal as exhibit 7 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

10. Attached as Exhibit 8 is a true and correct copy of excerpts from the November 10, 2020 deposition of Mortimer D.A. Sackler. This document was previously filed under seal as exhibit 8 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

11. Attached as Exhibit 9 is a partially redacted true and correct copy of a presentation by Purdue Management to the Purdue Board titled “Year in Review – 2011” and dated October 31 – November 2, 2011, beginning with Bates number PPLPC012000349870. This document was previously filed under seal as exhibit 9 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

12. Attached as Exhibit 10 is a partially redacted true and correct copy of an email chain between various Purdue executives and Sackler family members dated July 7, 2013, beginning with Bates number PPLPC012000431262. This document was previously filed under seal as exhibit 10 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

13. Attached as Exhibit 11 is a true and correct copy of a Purdue Board of Directors Meeting Agenda with attached board documents dated July 25, 2013, beginning with Bates number

PPLP004409781. This document was previously filed under seal as exhibit 11 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

14. Attached as Exhibit 12 is a true and correct copy of an excerpt from a 2013 year-end presentation by Purdue management to the Purdue Board of Directors, beginning with Bates number PPLP004409973. This document was previously filed under seal as exhibit 12 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

15. Attached as Exhibit 13 is a partially redacted true and correct copy of a 2015 Budget Executive Summary presentation by Purdue management to the Purdue Board of Directors, beginning with Bates number PPLP004411368. This document was previously filed under seal as exhibit 13 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

16. Attached as Exhibit 14 is a partially redacted true and correct copy of a document containing management answers to questions arising during a July 22, 2010 Purdue Shareholder & Board Meeting, beginning with Bates number PPLPC012000283163. This document was previously filed under seal as exhibit 14 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

17. Attached as Exhibit 15 is a partially redacted true and correct copy of an email chain between David Sackler, Jonathan Sackler, Mortimer D.A. Sackler, and Richard Sackler dated September 9, 2014, beginning with Bates number RSF00175886. This document was previously filed under seal as exhibit 15 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

18. Attached as Exhibit 16 is a true and correct copy of an excerpt of notes from a Purdue Board meeting, beginning with Bates number PPLPBN-00001785. This document was

previously filed under seal as exhibit 16 to the Supplemental Declaration of Jasmine Ball Dated December 9, 2020 (Dkt. No. 2096).

Dated: January 11, 2021
New York, New York

By: /s/ Jasmine Ball
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